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Michael Johnson

From:

Michael Johnson

Sent:

Wednesday, May 10, 2023 11:22 AM

To:

Juanita Schwartzkopf

Cc:

Kent Ries; Annette Sanchez; Power, Jessica - MRP-AMS; gkarlberg@ampleo.com;

Quarles, Clint (AGR); Troy Mollerup

Subject:

RE: Records with Robert Prince of Prince & Brien

Good idea. Kent, let us know if you have time for a Teams call in the next few days so Focus can walk you through the information.

Michael Johnson | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111 Direct: +1 (801) 323-3363 | Facsimile: +1 (801) 532-7543 | www.rqn.com | vCard

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From: Juanita Schwartzkopf < j.schwartzkopf@focusmg.com>

Sent: Wednesday, May 10, 2023 11:14 AM **To:** Michael Johnson <MJohnson@rgn.com>

Cc: Kent Ries <kent@kentries.com>; Annette Sanchez <ASanchez@rgn.com>; Power, Jessica - MRP-AMS

<Jessica.L.Power@usda.gov>; gkarlberg@ampleo.com; Quarles, Clint (AGR) <Clint.Quarles@ky.gov>; Troy Mollerup

<TMollerup@rqn.com>

Subject: Re: Records with Robert Prince of Prince & Brien

CAUTION: EXTERNAL EMAIL

I think it would be easiest if we had an introductory call with Kent to explain the file layouts, etc. much like we did for Rabo. There are some folders that are empty and the explanation of how to use the inventory master files and the electronic records would be most helpful for a new user.

We would be able to send a hard drive with all the records. Don't think the thumb drive would be big enough given the magnitude of the files.

Juanita Schwartzkopf

773.724.2082 Office | 773.724.2083 Fax | 520.203.2926 Cell

j.schwartzkopf@focusmg.com

Focus Management Group

6585 N. Avondale Ave. Chicago, IL 60631

www.focusmg.com



On May 10, 2023, at 12:59 PM, Michael Johnson < MJohnson@rqn.com > wrote:

Copying Juanita from Focus and she can give you an idea of the actual physical number of boxes/documents that Focus has in its possession.

As noted, we have scans of all of the records in Focus's possession. I believe we can put all of the records on a thumb drive and send them to you.

Michael Johnson | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111 Direct: +1 (801) 323-3363 | Facsimile: +1 (801) 532-7543 | www.rgn.com| vCard

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From: Kent Ries < kent@kentries.com > Sent: Tuesday, May 9, 2023 8:37 PM

To: Annette Sanchez < ASanchez@rqn.com >; Power, Jessica - MRP-AMS < Jessica.L.Power@usda.gov >

Cc: gkarlberg@ampleo.com; Michael Johnson < MJohnson@rqn.com >; Quarles, Clint (AGR)

<<u>Clint.Quarles@ky.gov</u>>

Subject: RE: Records with Robert Prince of Prince & Brien

CAUTION: EXTERNAL EMAIL

I cant seem to get these docs, or the docs from Focus sent by Michael Doland. After a long time downloading, many or most of the folders are empty.

All these docs are property of the estate. Please give me an idea of how many boxes of docs there are. In the meantime, I need Focus or someone to put them on a thumbdrive and mail them to me so I know I have everything they scanned. Same for Rabo, and anyone else that has records of the Debtors.

Thanks.

Kent Ries PO Box 3100 Amarillo, TX 79116 806-242-7437

From: Annette Sanchez < ASanchez@rqn.com>

Sent: Tuesday, May 9, 2023 4:33 PM

To: Power, Jessica - MRP-AMS < Jessica.L.Power@usda.gov>

Cc: gkarlberg@ampleo.com; Michael Johnson < MJohnson@rqn.com >; Kent Ries < kent@kentries.com >;

Quarles, Clint (AGR) < Clint.Quarles@ky.gov>

Subject: RE: Records with Robert Prince of Prince & Brien

Hi Jessica,

Below is the sharefile link to the documents we received from Focus:

https://rqnlaw.sharefile.com/f/fo228b39-e62c-4e8c-ac5c-ed5b9e8b6b2d

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Please let me know if you have any trouble accessing the documents.

Thank you,

Annette Sanchez, Legal Assistant | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111

Direct: +1 (801) 323-3413 | Facsimile: +1 (801) 532-7543 | www.rqn.com

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From: Michael Johnson < MJohnson@rqn.com >

Sent: Tuesday, May 9, 2023 1:50 PM

To: Kent Ries <kent@kentries.com>; Power, Jessica - MRP-AMS <Jessica.L.Power@usda.gov>; Quarles,

Clint (AGR) < Clint.Quarles@ky.gov>

Cc: gkarlberg@ampleo.com; Annette Sanchez < ASanchez@rqn.com >

Subject: RE: Records with Robert Prince of Prince & Brien

Sounds good. We have downloaded the documents here as well so it might be easier for Annette to just share them with Jessica and Clint from RQN's data bases. There are a lot of records.

Michael Johnson | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111

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From: Kent Ries < kent@kentries.com > Sent: Tuesday, May 9, 2023 1:49 PM

To: Power, Jessica - MRP-AMS <Jessica.L.Power@usda.gov>; Michael Johnson <MJohnson@rqn.com>;

Quarles, Clint (AGR) < Clint.Quarles@ky.gov>

Cc: gkarlberg@ampleo.com; Annette Sanchez < ASanchez@rqn.com >

Subject: RE: Records with Robert Prince of Prince & Brien

CAUTION: EXTERNAL EMAIL

I am certainly agreeable to sharing the various Debtor's records with Jessica and the USDA. Thanks.

Kent Ries PO Box 3100 Amarillo, TX 79116 806-242-7437

From: Power, Jessica - MRP-AMS < <u>Jessica.L.Power@usda.gov</u>>

Sent: Tuesday, May 9, 2023 2:44 PM

To: Michael Johnson <MJohnson@rqn.com>; Quarles, Clint (AGR) <Clint.Quarles@ky.gov>

Cc: gkarlberg@ampleo.com; Kent Ries < kent@kentries.com >; Annette Sanchez < ASanchez@rqn.com >

Subject: Re: Records with Robert Prince of Prince & Brien

Sounds good I'll look forward to your assistants link and get you the scanned records from the Blue House Tote.

Get Outlook for iOS

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From: Michael Johnson < MJohnson@rqn.com >

Sent: Tuesday, May 9, 2023 3:41:55 PM

To: Power, Jessica - MRP-AMS < Jessica.L.Power@usda.gov>; Quarles, Clint (AGR)

<Clint.Quarles@ky.gov>

Cc: gkarlberg@ampleo.com <gkarlberg@ampleo.com>; Kent Ries <<u>kent@kentries.com</u>>; Annette

Sanchez < ASanchez@rgn.com>

Subject: RE: Records with Robert Prince of Prince & Brien

Hi Jessica. My assistant Annette can send you a share file link.

As far as the documents we have, those have all been scanned in. Those are technically under the Chapter 7 Trustee's control. If Kent will authorize us to provide you and Clint a link then I will have Focus send that link to you.

Michael Johnson | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111

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From: Power, Jessica - MRP-AMS < Jessica.L.Power@usda.gov >

Sent: Tuesday, May 9, 2023 11:57 AM

To: Quarles, Clint (AGR) < Clint.Quarles@ky.gov >; Michael Johnson < MJohnson@rqn.com >

Cc: gkarlberg@ampleo.com; Kent Ries < kent@kentries.com > **Subject:** RE: Records with Robert Prince of Prince & Brien

CAUTION: EXTERNAL EMAIL

Mr. Johnson,

If you have a secure cloud location you'd like me to "drop" the scans I will do that for you too. Just let me know whats best and fastest.

Thanks Jessica

From: Power, Jessica - MRP-AMS Sent: Tuesday, May 9, 2023 1:49 PM

To: Quarles, Clint (AGR) < Clint.Quarles@ky.gov>; Michael Johnson < MJohnson@rqn.com>

Cc: gkarlberg@ampleo.com; Kent Ries < kent@kentries.com > **Subject:** RE: Records with Robert Prince of Prince & Brien

Yes I have the scanned documents from the "house tote", my cloudvault is experiencing some server error USDA wide to securely upload today. However I'm willing to get the scans to you ASAP.

From: Quarles, Clint (AGR) <Clint.Quarles@ky.gov>

Sent: Tuesday, May 9, 2023 1:46 PM

To: Michael Johnson <MJohnson@rqn.com>; Power, Jessica - MRP-AMS <Jessica.L.Power@usda.gov>

Cc: gkarlberg@ampleo.com; Kent Ries < kent@kentries.com > **Subject:** RE: Records with Robert Prince of Prince & Brien

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Can we hop on a call?

Other than the computer and phone, I think Jessica has those scans and are ready for you, and I believe has offered to Glen a few times.

I think we have another very timely issue to discuss as well.

Would now work?

Clint Quarles
Attorney, Kentucky Department of Agriculture
107 Corporate Drive
Frankfort, KY 40601
O- 502-782-0284
C- 502-330-6360

From: Michael Johnson < MJohnson@rqn.com >

Sent: Tuesday, May 9, 2023 1:32 PM

To: Quarles, Clint (AGR) < Clint.Quarles@ky.gov>

Cc: gkarlberg@ampleo.com; Kent Ries < kent@kentries.com >

Subject: Records with Robert Prince of Prince & Brien

Clint:

I understand from Glenn that the records that you and the USDA took and made copies of were returned to Attorney Robert Prince, and that Mr. Prince is now refusing to return the records. While I believe the Trustee will make demand on Mr. Prince for the original records it could take some time to get them. Can you get us (Glenn, me and the Trustee) copies of whatever you guys made so we will at least have those?

Michael Johnson | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111 Direct: +1 (801) 323-3363 | Facsimile: +1 (801) 532-7543 | www.rqn.com| vCard

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